

REMARKS

Claims 1 to 28 are in the application. These claims stand rejected as unpatentable over Shaw in view of Coffey.

Method claim 1 has been amended to specify providing one or more media resource cards each of which includes a separate processor and at least one digital signal processor (DSP). That claim goes on to require dynamically allocating resource points from the central pool to said one or more media resource cards as needed to enable the DSP's thereof, under the control of their respective separate processors, to collectively perform specific DSP services for customers authorized by the allocated resource points.

The converged services platform recited in independent claim 10 has likewise been amended to specify that each of the media resource cards includes at least one digital signal processor (DSP) and a separate control processor. Also the last clause of claim 10 now requires a main processor for dynamically allocating resource points from the central pool to one or more media resource cards as needed to enable the DSP's thereof, under the control of their respective separate processors, to collectively perform specific DSP services for a customer as authorized by the allocated resource points.

Independent method claim 21 has been amended along similar lines.

Support for the aforesaid amendments is found in specification pages 2 and 3 and Fig. 2. As seen there, applicant's invention employs individual media resource cards each of which provides digital signal processing capability (DSPs 46) and a separate control processor (CPU 56) to handle a particular service request, if the user is authorized.

This request can be evaluated and the user can be billed according to such usage based upon the resource allocation points required for the usage.

The method and system also provide for load balancing in that if the customer's service request cannot be handled by a first DSP, then a different DSP or DSPs on a different media resource card are assigned the task by the present system, but only if the user is licensed and authorized for same.

It should be emphasized that each media resource card has its own separate, dedicated, processor and one or more DSPs so that resource cards may be added or subtracted from the overall system to meet the changing needs of the system's customer base. As described in specification page 4, last paragraph, when a resource card is added to the converged services platform, additional default resource points are added to the central system resource point pool maintained on the main CPU card 12a. The total points present in the pool is the sum of all default resource points dependant on the number of cards, plus any additional points that are licensed. These total points are available to any given resource card. We submit that the systems disclosed in the cited references do not have these features and, therefore, cannot operate in accordance with applicant's claimed method.

On pages 4 and 8 of the action, the Examiner suggests that Coffey teaches dynamically allocating available pool portions or resource points to media resource cards in order to perform media resource services, as needed for a customer, referring to pat col. 6, lines 35-53 and col. 8, lines 6-16. However, those patent excerpts do not suggest providing individual resource cards each with at least one DSP and its own separate proces-

sor as would enable those cards using their respective separate processors to collectively perform specific DSP services for a customer as authorized by the allocated resource points.

Accordingly the cited Shaw and Coffey references whether considered alone or in proper combination fail to teach applicant's claimed method and converged services platform. Accordingly claims 1, 10 and 21, and the claims dependent thereon should be allowed.

Please charge any additional fee occasioned by this paper to our Deposit Account No. 03-1237.

Respectfully submitted,

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